



Anticorruption Policy

1. Purpose

The purpose of this Policy¹ is to reiterate the commitment included in our Code of Ethics and Conduct of zero tolerance to any situation leading to acts of Corruption in Vista Energy S.A.B. de C.V.'s name and interest or that of any of the companies that are part of the Vista group ("Vista" or the "Company"), as they conduct their activities, operations and business. It also presents the guidelines that need to be observed by those acting directly or indirectly in Vista's name. This Policy should be interpreted together with the attached annexes, which are an integral part of it, and with Vista's Code of Ethics and Conduct.

In this direction, Vista condemns the use of their role, function, position or influence to obtain Anything of Value, be it lawful or unlawful, for Vista, themselves or others.

2. Scope

Pursuant to the enforcement scope established by the Code of Ethics and Conduct, this Policy applies to (i) all Employees, regardless of their rank or employment contract, whether permanent or temporary, full time or part time, and Company directors, or those of any existing related companies or potential ones to be created in the future; (ii) relationships with Third Parties, and (iii) especially, to the activities that the Company carries out with the Public Sector, Public Officials, the communities where it operates, and society in general, as defined in Section 6 of the current Policy.

3. Supplementary and reference documents

Internal references

- Code of Ethics and Conduct
- Whistleblower Protection against Retaliation Policy
- Reporting Channel Management Policy

¹ Capitalized terms are defined in Section 4 of the current Policy

- Conduct and Corrective Action Policy
- Donations and Compensation Policy
- Procedure for Conducting an Internal Investigation of Breaches to the Code of Ethics and Conduct
- Included in this Policy: Anticorruption guidelines and form for donations and contributions

External references

- Argentine Law No. 27,401
- Mexico's General Law on Administrative Responsibilities
- US Foreign Corrupt Practices Act
- Any other external reference that may apply in the future to the activities, operations or business conducted by Vista

4. Definitions

Code	Vista's Code of Ethics and Conduct
Corruption	Act of offering or requesting, giving or receiving, either directly or indirectly, Anything of Value to exercise undue influence upon the actions of another party (Third party or Public Official). Synonyms include payoffs, bribery and kickbacks, among others.
Anything of Value	Any kind of goods, services or merchandise, in the broadest sense of these words; for example gifts, event tickets, entertainment, travel awards, hospitality for holiday accommodation, plane tickets, free accommodation, special privileges or gratuities, donations to designated charitable organizations, discounts, free personal services, financial loans or the promise of future employment, among others.
Employee	Vista personnel regardless of rank or type of employment contract, whether permanent or temporary, full time or part time, and Company senior management, or that of any existing related companies or potential ones to be created in the future.
Public Official	Generally speaking, any official, public servant or employee of any government or state-owned organization, agency or legal entity, at any level: public administration, centralized and decentralized agencies, including officers or employees of government-owned companies, privately managed companies with a public purpose, or international public organizations. It also includes candidates for public office, political party employees or politicians, as well as the political parties themselves.

Ethics Line	Different channels provided by the Company to report any non-compliance with the Code, or with any other Company laws, policies and/or procedures.
Public Sector	Any legislative, executive, administrative or judicial body, as well as their appointed or elected officials, paid or not, temporary or permanent, at the central or federal level. It includes state or government-owned companies, public-private partnerships, including their directors and officials, as well as entities rendering public services.
Third Parties	Any person or legal entity that is not a Company employee who renders services to the Company and/or acts in its name. Some Third Party examples include, but are not limited to, suppliers, contractors, subcontractors, joint venture partners, agents, intermediaries, investors, consultants, lobbyists, business representatives and customers.
Advantage or Undue Payment	Giving or receiving money, gifts, trips, entertainment, job offers, meals, illegal campaign contributions, improper event sponsorship, scholarships, luxury items, jewelry or gemstones, benefit contributions, among others. It may also involve a payment to a Public Official to ensure or speed up the execution of an action or service that a person or the Company has a normal legal right to. For example, payments to obtain permits, licenses or other official documents, regulatory approvals, blocking participation of an opponent in tenders, avoiding negative government stances, reducing taxes, avoiding custom duties or charges, government document processing such as visas and service orders, among others.

5. Responsibilities

Ethics Committee: among other tasks, the Company's Ethics Committee is responsible for: (i) communicating the Company's ethics and conduct principles; (ii) overseeing Policy management, execution and enforcement across all Company levels, and (iii) imposing the corresponding sanctions, in case of non-compliance with the Code of Ethics and Conduct and/or other Company policies.

Employees and Third Parties: Employees are responsible for complying with this Policy's guidelines, as they carry out their activities in or for the Company, as the case may be, as well as for reporting any situation that could result in a Policy violation. It is the duty of Employees and Third Parties to fully comply with applicable anticorruption regulations.

6. Development

Anticorruption guidelines

All Company Employees and related Third Parties should ensure that their activities are conducted with the highest ethical and integrity standards. It is therefore forbidden to offer or solicit, give or receive any Advantage or Undue Payment of any nature or class to or from any person, including, but not limited to, Public Officials, Public Sector or any private company or person, to influence or reward any official action or decision by such person in the Company's benefit.

As a general rule, every process to be carried out by Vista should comply with and respect any applicable law or regulation, as well as the Company's internal procedures.

Particularly sensitive processes, such as the ones listed below, require specific ad hoc monitoring to the level of detail also described below, in order to prevent or detect corrupt practices.

Anything of Value given to Third Parties

Company Employees or Third Parties in the Company's name are forbidden to give anybody Anything of Value if this is or could be interpreted as an attempt to:

- Exercise undue influence on a Public Official's decision or in the performance of his function or relevant activity.
- Unduly obtain or retain a business.
- Secure an Advantage or Undue Payment.

Anything of Value given to a Third Party should:

- Be related to an objective that is effectively related to a legitimate business.
- Be moderate and given in good faith.
- Be registered accurately and appropriately and be backed by any supporting documents.
- Not be sums of money regardless of the amount or recipient.
- Not be related to benefits from questionable or illegal activities.

Gift, invitation, trips and other benefit acceptance

Employees may accept gifts with commercial value below USD 50 (fifty US dollars) or its equivalent in local currency, in as much as these gifts are not made by the Third Party to influence the Employee's or their team's decision-making process when conducting Company business. Gifts exceeding this amount should be rejected by the Employee and handed over to the Company Office Manager on site, for him to return to the Third Party, letting them know

of the Company's policy regarding gifts, so that the Third Party refrains from offering gifts in the future.

The corresponding area manager and the Compliance Officer should be informed of any invitation to events, trips or other, so they can inform the Company's Ethics Committee, in order for the Committee to assess if there is a potential conflict of interest, and either authorize or forbid acceptance of the invitation.

No gifts may be accepted, even if below USD 50 (fifty US dollars) or its equivalent in local currency, if they interfere with decision-making or prevent Employees from effectively, objectively and ethically doing their work. Gifts may never be in cash.

Gifts under USD 50 (fifty US dollars), or its equivalent in local currency, from the same Third Party should be infrequent, moderate and accepted in good faith.

Third Parties should be made aware of this Policy regarding gifts and collaborate in supporting it. We therefore encourage Employees to communicate this Policy when interacting with Third Parties, if deemed convenient.

Events and sponsorship involving the Company

The existence of an effective relationship between event and sponsorships and Vista's business or institutional objectives needs to be verified, in a context of moderation and good faith.

It is mandatory to comply with the specific authorization process, and with the obligation to record and document all activities, and to meet the above mentioned specific maximum limits.

Donations/Contributions

Any donations for socially oriented projects, that are coordinated by socially-minded entities should be made pursuant to the Company's Donations and Compensation Policy, and subject to the Ethics Committee's approval. In this case, Employees need to observe the following standards and recommendations:

- Ensure that the funds or goods donated are used in accordance with the agreed objectives. Request written confirmation regarding the donation's use, arriving at an agreement to restrict the use of the funds to intended purposes only.
- Evaluate the recipient entity to confirm its reputation and/or its relations with Public Officials and/or the Public Sector.
- Funds should be donated by transfer to the entity's bank account. The account must be confirmed in writing.

- Ensure that donated fund or donated good beneficiaries are not Public Officials with incidence on Company business, or any of their family members.
- Request the beneficiary entity's audited financial statements.
- Establish the right to audit the books and supporting documents related to the donated funds, and
- Register all donations accurately in the Company's books and records, in a specific account created for this purpose.

Relationship with Third Parties

It will be required to determine the identity, experience, level of training and reputation of the Third Party. It will also be required to verify whether they actually have the technical, professional and organizational capabilities required and that they are in a position to effectively deliver the service.

Verify if any court decision has been issued against them —even if not final— or whether there is any ongoing investigation related to bribery, Corruption or any other unlawful activities.

The person in charge of the relationship with the Third Party will need to verify that the service is effectively delivered, and the price is appropriate.

Strategic company alliances, acquisitions and sales

Adequate due diligence needs to be performed, to identify the main Corruption risks factors and red flags.

Whenever there is an acquisition, a plan should be implemented to comply with this Policy as part of the post-acquisition merger program.

Similarly, contracts entered into as a result of strategic company alliances, acquisitions or sales should have anticorruption statements and guarantees.

The same criteria will apply when forming joint ventures with Third Parties to develop joint projects.

Accounting books and records

With respect to books and records, the Company should:

- Keep them in a manner that reflects all transactions accurately and fairly.

- Establish accounting controls that give reasonable assurance that all transactions are recorded accurately.
- Keep a true and exact record of the documents used to formalize transactions, including invoices, receipts and expense reports.
- Never include false or fraudulent documentation.
- Never keep inadequate, ambiguous or fraudulent records, nor carry out any other procedure, technique or accounting contraption that may conceal or otherwise disguise an Advantage or Undue Payment.

Contractual agreements

All contracts with Third Parties, particularly those that include direct or indirect interactions with Public Officials, or the Public Sector, should include at least the following clauses:

- an Anticorruption clause;
- a clause determining knowledge and acceptance of the Code, and the obligation to communicate it to Third Party's employees;
- a clause allowing termination of the contractual relationship in the event of any Ethics or Compliance violations;
- a clause that clearly establishes the method of payment, and how the services delivered will be verified and accounted for, in order for payment to be properly authorized; and
- a clause determining the precautionary steps to be taken upon potential contact with Public Officials.

All Third Parties providing services to the Company shall be previously required to sign the Statement of Acceptance and Commitment concerning Vista's Code of Ethics and Conduct, which establishes Vista's right to monitor or audit adherence to Ethics and Compliance obligations by Third Parties.

Employees should pay attention to all red flags potentially indicating deviations and, as applicable, they should report them as set forth by the Code of Ethics and Conduct, including, for instance, if the Third Party:

- is known for offering bribes;
- requests an excessive commission in cash or in any other irregular manner;
- is controlled by Public Officials or their family members or has a close relationship with the Public Sector;
- is recommended by Public Officials;
- provides or requests an improper invoice or other questionable documentation;
- refuses to include in writing in contracts and/or documents signed with the Company, references to measures against any acts damaging public administration or public funds, especially measures related to anticorruption laws and/or regulations, and

- proposes an unusual financial scheme, such as a request for payment in a bank account opened in a country other than that in which the service is being rendered or a request for payment in more than one bank account.

7. Consultation and reporting hotline

This Policy establishes that all Company Employees and Third Parties have the duty to immediately inform any attitude in violation of the principles and guidelines established by the Code or this Policy, either by resorting to their immediate supervisor, the Compliance Officer, the Company's Ethics Committee, or by using the reporting channels duly informed by the Company (the "Ethics Line").

All reports of alleged violations to this Policy will be treated in a strictly confidential manner and may be made anonymously. The reports received will be analyzed by the Company's Ethics Committee according to the Procedure for Conducting an Internal Investigation of Breaches to the Code of Ethics and Conduct.

The Company assumes the commitment to maintain confidentiality and the anonymity of the reporting party, protecting all information and/or documentation and meeting high security standards, particularly in relation to the reporting party's personal data or that of other parties that may lead to claimant identification.

8. No retaliation

The Company guarantees that it will not allow any kind of retaliation against an Employee or Third Party making a report in good faith, provided that the Employee or Third Party are not involved in the event in question. "Retaliation" means any adverse action taken against an Employee or Third Party for in good faith, reporting inappropriate behavior that is against Company principles, acts of Corruption being one of the possibilities.

Adverse actions may include threats, intimidation, harassment, discrimination, restricted opportunities for professional development or dismissal. Other examples include providing negative information about the Employee's performance—independent of deficiencies in their actual performance—, reassignments or apparent mistreatment as a result of the information provided. For more information, see the Whistleblower Protection against Retaliation Policy.

9. Policy violations: disciplinary sanctions

Any Company Employee or related Third Party will be subject to disciplinary sanctions upon the following non-compliance events:

- failing to comply with this Policy, other Company policies, the Company's Code of Ethics and Conduct and/or laws or standards governing Vista around the world;
- having direct knowledge of potential violations to this Policy and failing to report them through the designated channels, or
- misleading or obstructing the investigation or inquiries on potential Policy violations.

The disciplinary action for a Company Employee infringing the Code and this Policy may constitute grounds for dismissal and for the filing of legal actions in labor, civil, commercial or criminal courts. In the case of non-compliance by a Third Party, the relevant commercial relationship may be terminated, and legal actions may be filed in commercial, civil or criminal courts. The Ethics Committee shall observe the Conduct and Corrective Action Policy at all times.

10. Changes made to this version

Rev.1

Miguel Galuccio

Chief Executive Officer

Vista Energy S.A.B. de C.V.